

EXHIBIT G

From: [Alison Plessman](#)
To: [Weber, Olivia](#); [Salvatore Bonaccorso](#); john.neukom@skadden.com; jordan.feirman@skadden.com
Cc: mashley@irell.com; jwood@emlaw.com; crice@emlaw.com
Subject: RE: Joint Report (SNMPRI et al. v. Broadcom et al.)
Date: Tuesday, January 5, 2021 3:21:57 PM

Hi Olivia,

Thanks for sending the draft 26(f) report. We are reviewing and will provide comments shortly. As you know, we have been considering filing a motion to stay discovery pending resolution of our motion to dismiss for several reasons. Although we believe a stay is warranted under the circumstances here, we are willing to forego such a motion if you will confirm that you will not argue that the Defendants have somehow waived their defenses (including their personal jurisdiction and improper venue defenses) by agreeing to proceed with discovery (including but not limited to filing the Joint 26(f) report, serving initial disclosures, or serving or responding to discovery requests) while Defendants' motions are pending. Will you confirm that you will not argue waiver should Defendants agree to engage in such discovery-related activities?

Also, given the scope and number of your discovery requests and the fact that you served them on December 26, we will need more time to respond. Will you please agree to a 30-day extension?

Thanks,
Alison

Alison Plessman
D: 213.788.4542

From: Weber, Olivia <oweber@irell.com>
Sent: Monday, January 4, 2021 11:11 AM
To: Alison Plessman <aplessman@hueston.com>; Salvatore Bonaccorso <sbonaccorso@hueston.com>; john.neukom@skadden.com; jordan.feirman@skadden.com
Cc: mashley@irell.com; jwood@emlaw.com; crice@emlaw.com
Subject: Joint Report (SNMPRI et al. v. Broadcom et al.)

Counsel,

I hope everyone had a nice holiday. I attach a draft Joint Report—please provide Defendants' edits by close of business tomorrow so that we can make corresponding revisions if necessary. We will file the Joint Report on January 6.

Please also let us know whether we have permission to add Defendants' names and counsel's signatures to the attached form indicating non-consent to the magistrate judge.

Best,

Olivia

Olivia Weber | Irell & Manella LLP | 949.760.5146 | oweber@irell.com

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